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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

)	Case No.: 2:16-cv-00166-FMO-RAO
LFP IP, LLC,)	
)	
Plaintiff,)	DECLARATION OF MARK S.
)	HOFFMAN IN SUPPORT OF
vs.)	REQUEST TO CONTINUE TRIAL
)	DATE
LEE KEITH BRETT; and)	
DOES 1 through 10 inclusive,)	Current Trial Date: July 10, 2018
)	Proposed Trial Date: September 25, 2018
)	
Defendants.)	
)	
)	
)	

DECLARATION OF MARK S. HOFFMAN

I, MARK S. HOFFMAN, hereby declare and state:

1. I am an attorney at law duly licensed and admitted to practice in the State of California. I am lead trial counsel to Plaintiff LFP IP, LLC. I have personal and first-hand knowledge of the facts set forth in this Declaration and could and would competently testify to the following, except as to those matters that are stated on information and belief, and to those matters I believe them to be true.

2. I was previously identified as trial counsel in the Joint Report Pursuant to Rule 26(f), filed on July 1, 2016 (Document 19), and planned to try this case with my co-counsel, Jonathan Brown, as my “second chair.”

3. I have reviewed the Minute Order dated May 24, 2018 (Document 62), setting the first day of trial for July 10, 2018, six weeks from the date of this declaration.

4. Unfortunately, I previously scheduled a vacation in July, and I am scheduled to leave California on July 11, 2018. My vacation is pre-paid, as I have booked my airline flights and accommodations for my vacation prior to receiving the trial setting order dated May 24, 2018.

1 5. In addition, I have been informed that the principal of Plaintiff, Larry
2 Flynt, a witness that plans to testify in this case, will be out of the country during
3 the current trial dates.
4

5 6. This is Plaintiff's first request to continue the trial date. No previous
6 requests have been made by any party to this lawsuit.
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8 7. Given the above, I respectfully request that the trial be continued and
9 rescheduled to September 25, 2018, or on a date thereafter that is convenient to the
10 Court.
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12
13 I declare under penalty of perjury, under the laws of the United States and
14 the State of California, that the foregoing is true and correct. Executed this 29th
15 day of May 2018, at Los Angeles, California.
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18 /s/ Mark S. Hoffman
19 Mark S. Hoffman, Declarant
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